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February 1, 2021

Hon. Gary R. Brown
US District Court for the Eastern District of New York
100 Federal Plaza – Courtroom 840
Central Islip, NY 11722-9014

VIA PACER

Re: Plaintiff's Response to Defendant's Letter (Doc. No. 21) / *BR Restaurant Corp. v. Nationwide Mut. Ins. Co.*, USDC (EDNY), Case No. 20-cv-02756-GRB-AKT

Your Honor:

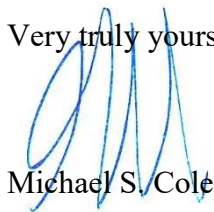
Regarding the granted application for yet additional authorities which defendant insurance company describes but has yet to submit.

This is the second application for additional authorities granted on a motion fully submitted September 3, 2020. The first such application was on September 30, 2020.

In its letter to the court of January 26, 2021, the insurer states these additional authorities are New York federal district court decisions. Such authorities therefore should have been submitted as soon as permission was granted.

Whether by intent or otherwise, this delay upon delay denies the plaintiff struggling New York City restaurant in midst of pandemic closure on the insurance issue: a paradigm for justice delayed justice denied.

Very truly yours,



Michael S. Cole